

THE HONORABLE FRANKLIN D. BURGESS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CYNTHIA CORRIE AND CRAIG CORRIE,
ON THEIR OWN BEHALF AND AS PERSONAL
REPRESENTATIVES OF THE ESTATE OF
RACHEL CORRIE AND HER NEXT OF KIN,
INCLUDING HER SIBLINGS; MAHMOUD OMAR
AL SHO'BI, ON HIS OWN BEHALF, ON BEHALF
OF HIS SURVIVING SIBLINGS MUHAMMAD
AL SHO'BI AND SAMIRA AL SHO'BI, AND ON
BEHALF OF HIS DECEASED FAMILY MEMBERS,
UMAR AL SHO'BI, FATIMA AL SHO'BI, ABIR AL
SHO'BI, SAMIR AL SHO'BI, ANAS AL SHO'BI,
AZZAM AL SHO'BI AND ABDALLAH
AL SHO'BI; FATHIYA MUHAMMAD
SULAYMAN FAYED, ON HER OWN BEHALF
AND ON BEHALF OF HER DECEASED SON,
JAMAL FAYED AND HIS NEXT OF KIN;
FAYEZ ALI MOHAMMED ABU HUSSEIN ON
HIS OWN BEHALF AND ON BEHALF OF HIS
SONS, BAHJAT FAYEZ ABU HUSSEIN,
AHMED FAYEZ ABU HUSSEIN, NOUR FAYEZ
ABU HUSSEIN AND SABAH FAYEZ
ABU HUSSEIN; MAJEDA RADWAN
ABU HUSSEIN ON HER OWN
BEHALF AND ON BEHALF OF HER
DAUGHTERS, HANAN FAYEZ ABU HUSSEIN,
MANAL FAYEZ ABU HUSSEIN, INSHERAH
FAYEZ ABU HUSSEIN, AND FADWA FAYEZ
ABU HUSSEIN; EIDA IBRAHIM SULEIMAN
KHALAFALLAH ON HER OWN BEHALF
AND ON BEHALF OF HER DECEASED

Civil Action No. CV-05192-FDB

**STIPULATION AND
PROPOSED ORDER RE:
SECOND EXTENSION OF TIME
FOR PLAINTIFFS TO FILE
OPPOSITION TO
DEFENDANT'S MOTION TO
DISMISS**

**STIPULATION AND ORDER RE: SECOND EXTENSION
OF TIME TO FILE OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS (CV-05192-FDB) – PAGE 1 OF 4**

SEATTLE UNIVERSITY
RONALD A. PETERSON LAW CLINIC
1112 E. Columbia
Seattle, WA 98122-4340
TELEPHONE: (206) 398-4130
FACSIMILE: (206) 398-4136

HUSBAND, IBRAHIM MAHMOUD MOHAMMED)
KHALAFALLAH AND NEXT OF KIN,)

PLAINTIFFS,)

v.)

CATERPILLAR, INC., a Foreign Corporation,)

DEFENDANT.)

STIPULATION

IT IS HEREBY STIPULATED by and between Plaintiffs and Defendant herein, through their respective counsel of record, and subject to the approval of the Court, that Plaintiffs have an extension of seventeen (17) days to and including August 15, 2005 within which to file their Opposition to Defendant's Motion to Dismiss in this matter, which is presently scheduled on the Motion Calendar for July 29, 2005. Plaintiffs need an additional extension of time due to vacation schedules of experts and attorneys. The Court previously granted an extension to July 29, 2005 and that deadline has not yet passed.

DATED this 18th day of July, 2005.

SEATTLE UNIVERSITY
RONALD A. PETERSON LAW CLINIC

By: /s/ Gwynne Skinner

Gwynne Skinner, WSBA No. 23490
1112 E. Columbia
Seattle, WA 98122-4340
Tel: (206) 398-4130
Fax: (206)398-4136
Email: gskinner@pilg.org
Email: dfinger@pilg.org

PUBLIC INTEREST LAW GROUP PLLC

Gwynne Skinner, WSBA No. 23490
Davida Finger, Of Counsel, WSBA No. 32818
705 Second Avenue, Suite 501
Seattle, WA 98104
Tel: (206) 447-0103
Fax: (206) 447-0115
Email: gskinner@pilg.org
Email: dfinger@pilg.org

**STIPULATION AND ORDER RE: SECOND EXTENSION
OF TIME TO FILE OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS (CV-05192-FDB) – PAGE 2 OF 4**

SEATTLE UNIVERSITY
RONALD A. PETERSON LAW CLINIC
1112 E. Columbia
Seattle, WA 98122-4340
TELEPHONE: (206) 398-4130
FACSIMILE: (206) 398-4136

CENTER FOR CONSTITUTIONAL RIGHTS

Jennifer M. Green
666 Broadway, 7th Floor
New York, NY 10012
Tel: (212)614-6431
Fax: (212)614-6499
Email: jgreen@ccr-ny.org

ATTORNEYS FOR PLAINTIFFS
GRAHAM & DUNN PC

By: /s/ James L. Magee
James L. Magee, WSBA #1294
2801 Alaskan Way, Suite 300
Seattle, WA 98121-1128
Tel: (206)624-8300
Fax: (206)340-9599
E-mail: jmagee@grahamdunn.com

HOWREY LLP

Robert G. Abrams (*Admitted Pro Hac Vice*)
1299 Pennsylvania Avenue N.W.
Washington, D.C. 20004-2402
Tel: (202)383-6935
Fax: (202)383-6610
E-mail: abramsr@howrey.com

HOWREY LLP

Joanne E. Caruso (*Admitted Pro Hac Vice*)
E-mail: carusoj@howrey.com
Richard J. Burdger, Jr. (*Admitted Pro Hac Vice*)
E-mail: burdger@howrey.com
David G. Meyer (*Admitted Pro Hac Vice*)
E-mail: meyerd@howrey.com
550 South Hope Street, Suite 1100
Los Angeles, CA 90071
Phone: (213) 892-1800
Fax: (213) 892-2300

ATTORNEYS FOR DEFENDANT

**ORDER ON EXTENSION OF TIME TO FILE PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION TO DISMISS**

IT IS SO ORDERED.

DATED this 28th day of July 2005.



**FRANKLIN D. BURGESS
UNITED STATES DISTRICT JUDGE**